

State: MONTANA

STATE PLAN FOR INDEPENDENT LIVING (SPIIL)

Chapter 1, Title VII of the Rehabilitation Act of 1973, as Amended

STATE INDEPENDENT LIVING SERVICES (SILS) PROGRAM PART B

CENTERS FOR INDEPENDENT LIVING (CIL) PROGRAM PART C

FISCAL YEARS 2017-2019

Effective Date: October 1, 2016

OMB NUMBER: 1820-0527

TABLE OF CONTENTS

Part I: Assurances

Section 1: Legal Basis and Certifications	3
Section 2: SPIL Development	3
Section 3: Independent Living Services	5
Section 4: Eligibility	5
Section 5: Staffing Requirements	5
Section 6: Fiscal Control and Fund Accounting	6
Section 7: Recordkeeping, Access and Reporting	6
Section 8: Protection, Use and Release of Personal Information	7
Section 9: Signatures.....	7

Part II: Narrative

Section 1: Goals, Objectives and Activities.....	8
Section 2: Scope, Extent, and Arrangements of Services	12
Section 3: Design for the Statewide Network of Centers	14
Section 4: Designated State Unit (DSU)	14
Section 5: Statewide Independent Living Council (SILC)	15
Section 6: Service Provider Requirements	16
Section 7: Evaluation	17
Section 8: State-Imposed Requirements	17

PART I: Assurances

State of: Montana

Section 1: Legal Basis and Certifications

- 1.1 The designated State unit (DSU) eligible to submit the State Plan for Independent Living (SPIL or the plan) and authorized under State law to perform the functions of the State under the State Independent Living Services (SILS) and Centers for Independent Living (CIL) programs is Montana Department of Public Health and Human Services, Disability Employment and Transitions Division.
- 1.2 The separate State agency eligible to submit the plan and authorized under State law to provide vocational rehabilitation (VR) services to individuals who are blind is Montana Department of Public Health and Human Services, Disability Employment and Transitions Division. Indicate N/A if not applicable.
- 1.3 The Statewide Independent Living Council (SILC) that meets the requirements of section 705 of the Act and is authorized to perform the functions outlined in section 705(c) of the Act in the State is the Montana Statewide Independent Living Council.
- 1.4 The DSU and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, and the SILC are authorized to jointly develop, sign and submit this SPIL on behalf of the State, and have adopted or otherwise formally approved the SPIL. *Yes – The SPIL was jointly developed, signed, and submitted by the SILC Chair, and at least 51% of the CIL directors. The DSE signed acknowledging responsibility to receive, hold and disburse Federal funds made available under the SPIL.*
- 1.5 The DSU, and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, may legally carry out each provision of the plan and will comply with all applicable Federal statutes and regulations in effect with respect to the three-year period it receives funding under the SPIL. *Yes*
- 1.6 The SPIL is the basis for State operation and administration of the program. All provisions of the SPIL are consistent with State law. *Yes*
- 1.7 The representative of the DSU and, if applicable, of the separate State agency authorized to provide VR services to individuals who are blind, who has the authority under State law to receive, hold, and disburse Federal funds made available under the SPIL and to submit the SPIL jointly with the SILC chairperson is N/A

Section 2: SPIL Development

- 2.1 The plan shall be reviewed and revised not less than once every three years, to ensure the existence of appropriate planning, financial support and coordination, and other assistance to appropriately address, on a statewide and comprehensive basis, the needs in the State for:
 - The provision of State independent living services;

- The development and support of a statewide network of centers for independent living; and
 - Working relationships between programs providing independent living services and independent living centers, the vocational rehabilitation program established under title I, and other programs providing services for individuals with disabilities. *Yes*
- 2.2 The DSU and SILC conduct public meetings to provide all segments of the public, including interested groups, organizations and individuals, an opportunity to comment on the State plan prior to its submission to the Commissioner and on any revisions to the approved State plan. *Yes*
- 2.3 The DSU and SILC establish and maintain a written description of procedures for conducting public meetings in accordance with the following requirements. The DSU and SILC shall provide:
- appropriate and sufficient notice of the public meetings (that is, at least 30 days prior to the public meeting through various media available to the general public, such as newspapers and public service announcements, and through specific contacts with appropriate constituency groups and organizations identified by the DSU and SILC);
 - reasonable accommodation to individuals with disabilities who rely on alternative modes of communication in the conduct of the public meetings, including providing sign language interpreters and audio-loops; and public meeting notices, written material provided prior to or at the public meetings, and the approved State plan in accessible formats for individuals who rely on alternative modes of communication. *Yes*
- 2.4 At the public meetings to develop the State plan, the DSU and SILC identify those provisions in the SPIL that are State-imposed requirements beyond what would be required to comply with the regulations in 34 CFR parts 364, 365, 366, and 367. *Yes*
- 2.5 The DSU will seek to incorporate into, and describe in, the State plan any new methods or approaches for the provision of IL services to older individuals who are blind that are developed under a project funded under chapter 2 of title VII of the Act and that the DSU determines to be effective. *Yes*
- 2.6 The DSU and SILC actively consult, as appropriate, in the development of the State plan with the director of the Client Assistance Program (CAP) authorized under section 112 of the Act. *Yes*

Section 3: Independent Living Services

- 3.1 The State, directly or through grants or contracts, will provide IL services with Federal, State, or other funds. *Yes*
- 3.2 Independent living services shall be provided to individuals with significant disabilities in accordance with an independent living plan mutually agreed upon by an appropriate staff member of the service provider and the individual, unless the individual signs a waiver stating that such a plan is unnecessary. *Yes*

3.3 All service providers will use formats that are accessible to notify individuals seeking or receiving IL services under chapter 1 of title VII about:

- the availability of the CAP authorized by section 112 of the Act;
- the purposes of the services provided under the CAP; and
- how to contact the CAP. *Yes*

3.4 Participating service providers meet all applicable State licensure or certification requirements. *Yes*

Section 4: Eligibility

4.1 Any individual with a significant disability, as defined in 34 CFR 364.4(b), is eligible for IL services under the SILS and CIL programs authorized under chapter 1 of title VII of the Act. Any individual may seek information about IL services under these programs and request referral to other services and programs for individuals with significant disabilities, as appropriate. The determination of an individual's eligibility for IL services under the SILS and CIL programs meets the requirements of 34 CFR 364.51. *Yes*

4.2 Service providers apply eligibility requirements without regard to age, color, creed, gender, national origin, race, religion or type of significant disability of the individual applying for IL services. *Yes*

4.3 Service providers do not impose any State or local residence requirement that excludes any individual who is present in the State and who is otherwise eligible for IL services from receiving IL services. *Yes*

Section 5: Staffing Requirements

5.1 Service provider staff includes personnel who are specialists in the development and provision of IL services and in the development and support of centers. *Yes*

5.2 To the maximum extent feasible, a service provider makes available personnel able to communicate:

- with individuals with significant disabilities who rely on alternative modes of communication, such as manual communication, nonverbal communication devices, Braille or audio tapes, and who apply for or receive IL services under title VII of the Act; and
- in the native languages of individuals with significant disabilities whose English proficiency is limited and who apply for or receive IL services under title VII of the Act. *Yes*

5.3 Service providers establish and maintain a program of staff development for all classes of positions involved in providing IL services and, if appropriate, in administering the CIL program. The staff development programs emphasize improving the skills of staff directly

responsible for the provision of IL services, including knowledge of and practice in the IL philosophy. *Yes*

- 5.4 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will take affirmative action to employ and advance in employment qualified individuals with significant disabilities on the same terms and conditions required with respect to the employment of individuals with disabilities under section 503 of the Act. *Yes*

Section 6: Fiscal Control and Fund Accounting

- 6.1 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will comply with applicable EDGAR fiscal and accounting requirements and will adopt those fiscal control and fund accounting procedures as may be necessary to ensure the proper disbursement of and accounting for those funds. *Yes*

Section 7: Recordkeeping, Access and Reporting

- 7.1 In addition to complying with applicable EDGAR recordkeeping requirements, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will maintain records that fully disclose and document:
- the amount and disposition by the recipient of that financial assistance;
 - The total cost of the project or undertaking in connection with which the financial assistance is given or used;
 - the amount of that portion of the cost of the project or undertaking supplied by other sources;
 - compliance with the requirements of chapter 1 of title VII of the Act and Part 364 of the regulations; and
 - other information that the Commissioner determines to be appropriate to facilitate an effective audit. *Yes*
- 7.2 With respect to the records that are required by 34 CFR 364.35, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will submit reports that the Commissioner determines to be appropriate. *Yes*
- 7.3 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will provide access to the Commissioner and the Comptroller General, or any of their duly authorized representatives, to the records listed in 34 CFR 364.37 for the purpose of conducting audits, examinations, and compliance reviews. *Yes*

Section 8: Protection, Use, and Release of Personal Information

- 8.1 Each service provider will adopt and implement policies and procedures to safeguard the confidentiality of all personal information, including photographs and lists of names in accordance with the requirements of 34 CFR 364.56(a)(1-6). *Yes*

Section 9: Signatures

After having carefully reviewed all of the assurances in sections 1 - 8 of this SPIL, the undersigned hereby affirm that the State of Montana is in compliance and will remain in compliance with the aforementioned assurances during 2017-2019

The effective date of this SPIL is October 1, 2016

SIGNATURE OF SILC CHAIRPERSON	DATE
Mary Olson	

NAME OF SILC CHAIRPERSON

SIGNATURE OF DSU DIRECTOR	DATE
Jim Marks, Administrator, Disability Employment and Transitions Division	

NAME AND TITLE OF DSU DIRECTOR

SIGNATURE OF CIL DIRECTOR	DATE
Tom Osborn, Executive Director, North Central Independent Living Services	

NAME AND TITLE OF THE CIL DIRECTOR

SIGNATURE OF CIL DIRECTOR	DATE
Bob Maffit, CEO, Montana Independent Living Project	

NAME AND TITLE OF THE CIL DIRECTOR

SIGNATURE OF CIL DIRECTOR	DATE
Michael Mayer, Executive Director, Summit Independent Living Center	

NAME AND TITLE OF THE CIL DIRECTOR

SIGNATURE OF CIL DIRECTOR	DATE
Tami Hoar, Executive Director, Living Independently for Today and Tomorrow	

NAME AND TITLE OF THE CIL DIRECTOR

State of: Montana

Part II: Narrative

Section 1: Goals, Objectives and Activities

1.1 Goals and Mission – 34 CFR 364.42(b)(1)

Describe the overall goals and mission of the State's IL programs and services. The SPIL must address the goals and mission of both the SILS and the CIL programs, including those of the State agency for individuals who are blind as they relate to the parts of the SPIL administered by that agency.

The mission of this SPIL is to promote self-determination and full inclusion of people with disabilities in Montana.

Goal 1 – That IL Systems operate effectively and efficiently.

The SILC and CILs will seek methods and programs to provide the best possible services in the most efficient and effective manner,

Goal 2 – That public and private policy and practice are affected through advocacy, education, training, and awareness.

Partnering with public and private entities the SILC and CILs will promote IL through various media, programs, individuals, etc...

Goal 3 – That Montanans with disabilities have access to and receive quality and appropriate services.

The CILs supported by the SILC and other agencies will provide services to persons with disabilities, especially those who are unserved or underserved including youth, Native Americans, those living in rural and frontier areas of the state, and others seeking to live independently.

1.2 Objectives – 34 CFR 364.42(a)(1) and (d); 34 CFR 364.32; 34 CFR 364.33

1.2A Specify the objectives to be achieved and the time frame for achieving them.

Goal 1 – IL Systems operate effectively and efficiently.

- **Goal 1, Objective 1:** Explore the pros and cons of the SILC becoming a 501C-3 by the end of year 3 through an adhoc SILC committee comprised of SILC members, CILs, and other stakeholders to be formed no later than March 1, 2017.
 - Understand MT law as it relates to Governor appointed councils and 501c-3 status.
 - Explore options for a third party fiscal agent
 - Seek out and receive TA in reference to existing 501c-3 SILC models.

- Seek out information on 501c-3 implications and benefits on SILC operations
- **Goal 1, Objective 2:** In partnership with the MT network of CILS the SILC will explore and seek funding opportunities to meet increasing demand, federal requirements, and enhance IL services.
 - Monitor and seek both private and public national, state and local funding opportunities that meet the individual or systemic needs of consumers with disabilities in MT.
 - Seek out and attain training on resource development as needed.
- **Goal 1, Objective 3:** In partnership with the MT network of CILS, the SILC will explore training opportunities that align with IL Philosophy.
 - Seek and obtain training opportunities through state, local, and national IL and other disability networks.
 - Stay abreast of and disseminate emerging practices in implementation of the 5 core and other IL services.
 - Maintain memberships to national network partners i.e. APRIL and NCIL.

Goal 2- Affect public and private policy and practice through advocacy, education, training, and awareness.

- **Goal 2, Objective 1:** Promote education and awareness to the public to mitigate attitudinal barriers towards people with disabilities.
 - Re-establish a public relations and education SILC ad hoc committee.
 - Explore and utilize social media and other multimedia tools.
 - Utilize PR methods (media, PSA's etc.) to promote targeted disability related information to the public (ex. Disability etiquette, access...) as identified by consumer input.
 - Educate on the IL philosophy, disability rights and IL history/culture, and self-determination.
 - Collaborate with allies and community partners to expand and coordinate education efforts.
- **Goal 2, Objective 2:** People with disabilities are provided opportunities to be involved in promoting disability rights at the local, state, and national levels.
 - Promote, train on, and utilize an IL Action Alert system.

- Outreach to encourage and support peers, consumers, and the public to get involved in IL grassroots strategies (i.e. attending community meetings, voting, joining organizations etc.)
- Collaborate with allies and community partners to expand and coordinate grassroots advocacy efforts.
- **Goal 2, Objective 3:** SILC will partner with and support MT CIL Network efforts to promote systemic change (ex. Housing, transportation, employment, accessibility etc.)
 - Host annual structured public listening sessions.
 - Encourage SILC members to engage with the IL Action Alert System
 - Encourage SILC members to participate in the Independent Living Task Forces.
 - Inform and encourage SILC members of opportunities to get involved with their local CIL.
- **Goal 2, Objective 4:** The Montana IL Network will work to ensure people with disabilities and communities are ready and able for transition/diversion from institutions so they can live in the community of their choices.
 - Form a collaborative workgroup to conduct advocacy and other activities to ensure that transition services are at least maintained after the MFP grant expires in 2018.
 - Explore existing models, opportunities and advocacy avenues for MT IL Network to work towards delivering the transition services resembling the MT MFP design and intent.

Goal 3 People with disabilities will have access to and receive quality and appropriate services.

- **Goal 3, Objective 1:** The CIL network will target unserved and underserved populations through the current outreach model.
 - Maintain current CIL/Branch model of service outreach.
 - Outreach to and partner with other allied organizations including the 7 reservations in Montana.
 - The SILC and CILs will actively recruit tribal, youth, veteran, and other underserved/unserved consumers for SILC appointments and inclusion.
 - The MT IL Network will outreach to frontier and rural geographic service area locations.
 - The MT IL Network will conduct an assessment to identify current unserved or underserved ethnic populations and underserved geographic areas.

- **Goal 3, Objective 2:** The MT IL Network will serve people with disabilities through the 5 core and other IL services.
 - Provide training and TA to IL Network. (Ex. Teaching soft skills transition training, nursing home transition trainings, Motivational Interviewing).
 - Outreach to and collaborate with allied organizations.
 - Participate in local, state, national opportunities to expand CIL capacity by increasing staff.

((Evaluation: Provide at least 1 training to enhance CIL services. CIL and SILC members report at SILC meeting on outreach and collaborative efforts.
- **Goal 3, Objective 3:** Maintain and expand current practices to serve youth that are not identified in the 5th core service.
 - Explore and engage in the delivery of Pre-ETS services under WIOA.
 - Maintain support of the MyTransitions Project and MYLF.
 - Coordinate and collaborate with ASPIRE, schools, and other youth programs serving youth with disabilities

1.2B Describe the steps planned regarding outreach to populations in the State that are unserved or underserved by programs under title VII, including minority groups and urban and rural populations. This section of the SPIL must:

- Identify the populations to be designated for targeted outreach efforts;
- Identify the geographic areas (i.e., communities) in which the targeted populations reside; and
- Describe how the needs of individuals with significant disabilities from minority group backgrounds will be addressed.

CILs have identified and continue to identify underserved/unserved populations in their service delivery areas.

With the implementation of WIOA, youth aged 14-21 have become more of a focus point for the DSE, SILC, and CILs. The DSE is contracting with schools for pre-employment transition services. The CILs are also actively reaching out to youth through various programs such as Building Advocacy and Learning Leadership Skills (BALLS), Youth Opening Doors through Advocacy (YODA), Youth in Motion, and others. The Montana Youth Leadership Forum (MYLF) and the Montana Youth Transitions project are specifically designed to help youth develop the skills needed to succeed in life after high school, such as in college and in the work force.

Additionally, the Native American population has been identified as being an underserved

population. After individuals with disabilities, Native Americans are the largest minority group in the state, making up 6 percent of Montana's population, 60 percent of which live on the 7 federally recognized and 1 state recognized reservation. Summit Independent Living Center has one reservation in its service area. Living Independently for Today and Tomorrow (LIFTT) has two reservations in its service area. North Central Independent Living Services (NCILS) has the remaining 5 in its service area. Each of the CILs and the DSE works with the Section 121 directors to address IL issues in the Native American communities. The IL Network is working on a number of priorities to address the needs expressed by Native Americans with disabilities.

Montana is a large and largely rural state with some areas of the state being designated as frontier given the low population density. Areas furthest away from the few population centers are often underserved as well. The CILs have branch offices to help ease the difficulty people with disabilities have in obtaining services and addressing issues in their communities and homes. NCILS has offices in Great Falls and Glasgow. Montana Independent Living Program (MILP) has offices in Helena, Butte, and Bozeman. Summit ILC has offices in Missoula, Ronan, Hamilton, and Kalispell, as well as a separate office in Missoula for youth programs. LIFTT works closely with agencies in Miles City and Glendive to provide services in the eastern part of the state. In addition, LIFTT and NCILS have teamed together to serve the “big open” in the east central part of the state with its population average of only 4 people per square mile.

Employment for people with disabilities remains an issue in Montana as it is in the rest of the United States. Efforts being made to address this include the aforementioned Pre-Employment Transition Services for school aged youth as well as soft skills training, job training, job shadowing, and collaboration with Vocational Rehabilitation and Job Services. Several CIL directors and the IL Program Manager also participate in the Supported Employment Leadership Network (SELN). The SILC’s Competitive Integrated Employment Committee is working toward assisting workers in sheltered workshops, segregated and sub-minimum wage employment, transition into customized competitive integrated employment opportunities. The DSE and CILs are working together to fully implement Section 511 requirements

1.3 Financial Plan – 34 CFR 364.42(a)(2) and (3); 34 CFR 364.29

Describe in sections 1.3A and 1.3B, below, the financial plan for the use of Federal and non-Federal funds to meet the SPIL objectives.

1.3A Financial Plan Tables

Complete the financial plan tables covering years 1, 2 and 3 of this SPIL. For each funding source, provide estimated dollar amounts anticipated for the applicable uses. The financial plan table should include only those funding sources and amounts that are intended to support one or more of the objectives identified in section 1.2 of the SPIL. To the extent possible, the tables and narratives must reflect the applicable financial information from centers for independent living. Refer to the SPIL Instructions for additional information about completing the financial tables and narratives.

- Insert additional rows for the specific funding sources and amounts expected within the categories of Other Federal Funds and Non-Federal Funds.

Year 1 - Approximate Funding Amounts and Uses

Sources	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds - Chapter 1, Part B	10958	267915		26477
Title VII Funds - Chapter 1, Part C			839761	
Title VII Funds - Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal Funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)	8830			
Other Federal Funds - Other		20000		
Non-Federal Funds -State Funds	3608	29768		2942
Non-Federal Funds - Other		452570		77000
	23396	770253	839761	106419

Year 2 - Approximate Funding Amounts and Uses

Sources	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds - Chapter 1, Part B	10958	267915		26477
Title VII Funds - Chapter 1, Part C			839761	

Sources	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds - Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal Funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)	8830			
Other Federal Funds - Other		20000		
Non-Federal Funds -State Funds	3608	29768		2942
Non-Federal Funds - Other		452570		77000
	23396	770253	839761	106419

Year 3 - Approximate Funding Amounts and Uses

Sources	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds - Chapter 1, Part B	10958	267915		26477
Title VII Funds - Chapter 1, Part C			839761	
Title VII Funds - Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal Funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)	8830			

Sources	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Other Federal Funds - Other		20000		
Non-Federal Funds -State Funds	3608	29768		2942
Non-Federal Funds - Other		452570		77000
	23396	770253	839761	106419

1.3B Financial Plan Narratives

1.3B(1) Specify how the part B, part C and chapter 2 (Older Blind) funds, if applicable, will further the SPIL objectives.

The CILs goals incorporated into this SPIL are supported through the contracts for services from Part B, including match, listed under IL Services; the contracts for services from the state general fund listed under IL services; Part C funds listed under General CIL Operations. The goals supported by the Part B and General Fund dollars are those where it has been noted that a SILS goal has incorporated a CIL goal at least partially into a SILS goal. Part C funds are the primary funding source for supporting the operation of CILs and CILs goals.

1.3B(2) Describe efforts to coordinate Federal and State funding for centers and IL services, including the amounts, sources and purposes of the funding to be coordinated.

During allocation of state funding, issues such as imbalance of federal funding and underserved populations in the service areas are taken into consideration in order to try to equalize accessibility to IL services throughout Montana. This method has led to near equal funding levels from the core funding sources for CILs in Montana.

Part C funds are directly granted by ACL to all four Montana IL Centers. The state unit does not have the required funds to participate in the matching mechanism detailed in the statute; therefore, Part C grants are made directly to the CILs. Summit and MILP receive the majority of the available Part C funds available to Montana.

The following estimated projections are made for the Centers for Part B, Part C and State IL General Funds, actual distribution may vary as described previously in this plan. (Section 1.3A)

Beginning this new three year SPIL starting October 1, 2016, the Montana DSE, Disability Employment and Transition Division, will provide \$20,000 from the SSA program income, \$10,000 to the LIFTT and \$10,000 to NCILS centers for independent living. In addition, for each year of the SPIL the allocated independent living state general funds will be provided through a contract by the Montana DETD as follows: \$172,653 for LIFTT, \$90,232 for MILP, \$163,145 for NCILS, and \$26,538 for Summit. These funds will be used for the core IL services and to

provide services for identified underserved populations including Native Americans with disabilities, youth with disabilities, and person with disabilities seeking employment. In addition, for each year of the SPIL, the Montana SILC and DSE (DETD) have designated Part B monies as follows: \$120,125 for LIFTT, \$35,557 for MILP, 118,191 for NCILS and 23,809 for Summit. Finally, the SILC, CILs and DSE recognize the importance of providing IL services to people with disabilities throughout the state. Therefore, the Part C monies will be used to address these services. Part C is allocated by the federal government. The total Part C amounts for the first year are as follows: \$99,724 for LIFTT, \$276,714 for MILP, \$111,167 for NCILS and \$352,156 for Summit.

It is anticipated that funding levels for Part B, Part C and state General Fund will not change through the three years of this SPIL.

1.3B(3) Describe any in-kind resources including plant, equipment or services to be provided in support of the SILC resource plan, IL services, general CIL operations and/or other SPIL objectives.

Office supplies, access to major office equipment (copier, fax, scanner, laptop computer, projector, etc.) and access to DSU training are made available as in-kind contributions to support the program manager when carrying out activities to support the SILC and SPIL activities.

1.3B(4) Provide any additional information about the financial plan, as appropriate.

Should additional funding for IL services become available during the course of the plan, the first priority would be maintaining equal funding among the CILs in the three core funding areas (Part C Part B and Montana General Fund. The second priority would be to maintain adequate funding for the SILC resource plan. The third priority would be distributing all remaining funding equally among the four CILs. If funds received have earmarked purposes, the funds will be used for the designated purposes and not distributed per the preceding priorities. Likewise, if funding is reduced, IL services will be decreased proportionally.

1.4 Compatibility with Chapter 1 of Title VII and the CIL Work Plans – 34 CFR 364.42(c) and (e)

1.4A Describe how the SPIL objectives are consistent with and further the purpose of chapter 1 of title VII of the Act as stated in section 701 of the Act and 34 CFR 364.2.

The objectives of this SPIL were developed to provide outcomes consistent with the IL philosophy codified in WIOA. While it is true that at the time of submission of this SPIL the full set of rules under WIOA had not been finalized, the goals and objectives are such that they should capture the full spirit of the regulations.

The four CILs in the state work collaboratively with each other and with other agencies and groups to provide services to every corner of the state. Together the CILs and the SILC advocate for people with disabilities and help them to advocate for themselves. Whether it be a student with significant disabilities looking forward to a rewarding and productive life after high school or an elderly person desiring to spend the remaining years of their life in their own home, in the community of their choosing or any person with a disability living in between, the goals and

objectives of this SPIL will guide IL services in Montana throughout the 3 years of its existence and beyond.

Through the objectives the SILC will seek to advance the knowledge of its members. The CILs will provide the necessary services to help people with disabilities live as independently as they desire. Legislators and other community leaders will be made aware of issues pertinent to those with disabilities living among them. New ways of promoting and teaching self-determination and self-advocacy will be explored. Outreach will be made to people with disabilities living in the far flung reaches of the state, on the reservations, in the schools, and anywhere there is a need for education, services, and inclusion.

1.4B Describe how, in developing the SPIL objectives, the DSU and the SILC considered and incorporated, where appropriate, the priorities and objectives established by centers for independent living under section 725(c)(4) of the Act.

The SILC coordinated with the four Montana CILs to jointly develop the goals and objectives of this SPIL. All four CIL directors and the SILC chair, vice chair, and secretary, as well as several other key CIL staff formed the SPIL Development Committee that wrote this SPIL. The priorities and objectives of each CIL's three year plan use in SPIL development. The DSE provided additional information to the SILC and CILs which helped in defining the goals and objectives. Consumer input gathered from conducting statewide listening sessions also played a significant role in the development of this SPIL.

1.5 Cooperation, Coordination, and Working Relationships Among Various Entities – 34 CFR 364.26

Describe the steps that will be taken to maximize the cooperation, coordination and working relationships among the SILS program, the SILC, and centers; the DSU, other State agencies represented on the SILC and other councils that address the needs of specific disability populations and issues; and other public and private entities determined to be appropriate by the SILC.

- The description must identify the entities with which the DSU and the SILC will cooperate and coordinate.

SILC members are provided with information about the CILs during their orientation. Each CIL also provides an update of their activities during the quarterly SILC meetings. In addition, SILC members are encouraged to periodically visit the CIL nearest to their home. CIL directors are invited to all general SILC meetings and serve on various committees and task forces alongside SILC members and others in the community.

The DSE program manager serves as the liaison between the CILs, the SILC, and the DSE. The DSE IL program manager does a site visit to each CIL at least every other year. The program manager also attends board and other meetings at the CILs when invited to do so. Along with staff from the CILs and SILC members, the program manager participates in the various task forces and committees and aids in the planning of IL events such as Legislative Day, Rally

Day, symposiums and other statewide activities. The DSE program manager, with SILC input, prepares the contracts between the CILs and the DSE to distribute Part B and Montana General Fund monies.

The SILC has representation on the Montana Rehabilitation Council. This provides an avenue of mutual support for Vocational Rehabilitation and IL programs and issues. The chief of the Program Support Bureau at the DSE assists with the coordination of these various activities.

1.6 Coordination of Services – 34 CFR 364.27

Describe how IL services funded under chapter 1 of title VII of the Act will be coordinated with and complement other services to avoid unnecessary duplication with other Federal, State, and local programs, including the OIB program authorized by chapter 2 of title VII of the Act, that provide IL- or VR-related services.

The DSE is a division within the Montana Department of Public Health and Human Services (DPHHS). As such the DSE Program Manager is on a number of inter-departmental email distribution lists and is able to share information with other divisions in DPHHS. Information received that is pertinent to IL is shared with the SILC and CILs.

DSE staff, SILC members, and CIL staff are actively involved with a number of disability organizations, networks and coalitions which share information and resources for IL. At times, these other organizations send representatives to SILC meetings to educate and inform SILC members about the work they are doing. In turn, the SILC members may attend meetings held by those organizations and inform them about the work of the SILC. The SILC has representation on a number of local, state and national organizations which promote IL, including the Supported Employment Leadership Network (SELN), Joining Community Forces (JCF), the National Alliance on Mental Illness (NAMI), the Association of Programs for Rural Independent Living (APRIL), the National Council on Independent Living (NCIL),

Some SILC members and CIL staff are active on local transportation advisory councils (TAC), housing councils, councils on aging, and in Parents Lets Unite for Kids (PLUK), which is an organization that advocates for youth with disabilities in the schools and communities.

1.7 Independent Living Services for Individuals who are Older Blind – 34 CFR 364.28

Describe how the DSU seeks to incorporate into, and describe in, the State plan any new methods or approaches for the provision of IL services to older individuals who are blind that are developed under the Older Individuals who are Blind program and that the DSU determines to be effective. N/A

Section 2: Scope, Extent, and Arrangements of Services

2.1 Scope and Extent – 34 CFR 364.42(b)(2)(3); 34 CFR 364.43(b); 34 CFR 364.59(b)

2.1A Check the appropriate boxes in the SPIL Instrument table indicating the types of IL services to be provided to meet the objectives identified in section 1.2 of this SPIL, and whether the services will be provided by the CILs or by the DSU (directly and/or through contract or grant).

Table 2.1A: Independent living services

	Provided by the DSU (directly)	Provided by the DSU (through contract and/or grant)	Provided by the CILs (Not through DSU contracts/ grants)
Table 2.1A: Independent living services			
Core IL Services - Information and referral	No	Yes	Yes
Core IL Services - IL skills training	No	Yes	Yes
Core IL Services - Peer counseling	No	Yes	Yes
Core IL Services - Individual and systems advocacy	No	Yes	Yes
Counseling services, including psychological, psychotherapeutic, and related services	No	Yes	Yes
Services related to securing housing or shelter, including services related to community group living, and supportive of the purposes of this Act and of the titles of this Act, and adaptive housing services (including appropriate accommodations to and modifications of any space used to serve, or occupied by, individuals with significant disabilities)	No	Yes	Yes
Rehabilitation technology	No	Yes	Yes
Mobility training	No	Yes	Yes
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	No	Yes	Yes
Personal assistance services, including attendant care and the training of personnel providing such services	No	No	Yes
Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services	No	Yes	Yes
Consumer information programs on rehabilitation and IL services available under this Act, especially for minorities and other individuals with disabilities who have traditionally been unserved or underserved by programs under this Act	No	Yes	Yes
Education and training necessary for living in the community and participating in community activities	No	Yes	Yes

Table 2.1A: Independent living services	Provided by the DSU (directly)	Provided by the DSU (through contract and/or grant)	Provided by the CILs (Not through DSU contracts/ grants)
Supported living	No	Yes	Yes
Transportation, including referral and assistance for such transportation	No	Yes	Yes
Physical rehabilitation	No	Yes	Yes
Therapeutic treatment	No	Yes	Yes
Provision of needed prostheses and other appliances and devices	No	Yes	Yes
Individual and group social and recreational services	No	Yes	Yes
Training to develop skills specifically designed for youths who are individuals with significant disabilities to promote self-awareness and esteem, develop advocacy and self-empowerment skills, and explore career options	No	Yes	Yes
Services for children with significant disabilities	No	Yes	Yes
Services under other Federal, State, or local programs designed to provide resources, training, counseling, or other assistance of substantial benefit in enhancing the independence, productivity, and quality of life of individuals with significant disabilities	No	Yes	Yes
Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future	No	Yes	Yes
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities	No	Yes	Yes
Other necessary services not inconsistent with the Act	No	Yes	Yes

2.1B Describe any service provision priorities, including types of services or populations, established for meeting the SPIL objectives identified in section 1.2.

Because funding for IL services in Montana is inadequate to provide the same level of quality services across the full scope of IL services listed above, Montana prioritizes the support and strengthening of the five core IL services. The development of strong personal advocacy skills and a strong advocacy network for disability issues is particularly emphasized. While the core services are prioritized, CILs also respond to local community needs and provide other IL services as appropriate to meet demand. In addition, there is an emphasis in conducting outreach to the underserved populations described in 1.2B. The populations identified as underserved in Montana are Native Americans with disabilities, youth with disabilities, persons with disabilities

considering employment, and persons with disabilities residing in very rural areas of Montana.

2.1C If the State allows service providers to charge consumers for the cost of services or to consider the ability of individual consumers to pay for the cost of IL services, specify the types of IL services for which costs may be charged and for which a financial need test may be applied, and describe how the State will ensure that:

- Any consideration of financial need is applied uniformly so that all individuals who are eligible for IL services are treated equally; and
- Written policies and consumer documentation required by 34 CFR 364.59(d) will be kept by the service provider.

Indicate N/A if not applicable.

Montana allows service providers to charge customers for the cost of services and to consider the ability of the individual consumer to pay for the cost of IL services. However, it does not require them to do so and at this time no CILs require a financial needs test for the provision of IL services. Should a CIL indicate that they will be charging consumers for services, they will be required to provide attachments with the following documentation:

- Procedures in place to ensure that any consideration of financial need is applied uniformly so that all individuals who are eligible for IL services are treated equally; and
- Written policies and consumer documentation required by 34 CFR 364.59(d) will be kept by the service provider.
- During site reviews the service providers that have indicated that they plan to charge consumers will have their records reviewed related to compliance with the above requirements.

2.2 Arrangements for State-Provided Services – 34 CFR 364.43(d) and (e)

2.2A If the DSU will provide any of the IL services identified in section 2.1A through grants or contractual arrangements with third parties, describe such arrangements.

Montana provides services to individuals with disabilities through contracts for Part B funds and targeted general funds. Contracts are developed to ensure that federal requirements related to the operation of CILs and providing IL services to consumers are agreed to by the CILs. The contracts are also reviewed by SILC members prior to completion. In order to monitor for compliance with the terms of the contract, the DSE program manager and a SILC representative conduct periodic site reviews and auditors from the Department of Public Health and Human Services conduct periodic reviews that involve reviewing the financial procedures of the CILs.

2.2B If the State contracts with or awards a grant to a center for the general operation of the center, describe how the State will ensure that the determination of an individual's eligibility for services from that center shall be delegated to the center.

Eligibility of consumers is determined by each CIL. Contracts contain language reflecting the federal requirements for eligibility. During site visits documentation that the CILs are properly

determining eligibility per guidelines is reviewed.

Section 3: Design for the Statewide Network of Centers

3.1 Existing Network – 34 CFR 364.25

Provide an overview of the existing network of centers, including non-Part C-funded centers that comply with the standards and assurances in section 725 (b) and (c) of the Act, and the geographic areas and populations currently served by the centers.

Montana is a vast state covering approximately 147,000 square miles, divided into 56 counties. There are also seven federally recognized American Indian Reservations in the state and one state recognized Native American tribe which is working to obtain federally recognized status.

There are currently four primary CIL offices and six branch offices that form a network covering every county in the state. The CILs, including their branch offices, provide the five core IL services along with system change advocacy, education, social change, and awareness services. All four CILs receive a mix of Part B, state general fund, and Social Security Program income funds through contract with the State of Montana. Part C funds are dispersed to the CILs directly by the federal government. The estimated distribution of state funds for Part B and general funds are included in section 1.3 Financial Plan.

LIFTT provides services in 18 counties of vastly varied population size in southeastern Montana. Much of LIFTT's service area includes very rural and sparsely populated areas but also includes highly populated communities such as Billings in Yellowstone County. The service area also includes two American Indian Reservations spread across several counties. Those reservations include the Northern Cheyenne and Crow tribes. Currently LIFTT operates a main office in Billings and together with staff contact and community involvement from home offices in Dawson and Custer Counties LIFTT provides outreach to the remaining service area including Big Horn, Carbon, Carter, Fallon, Garfield, Golden Valley, McCone, Musselshell, Powder River, Prairie, Richland, Rosebud, Stillwater, Treasure, and Wibaux counties.

Summit's services are available to residents of Missoula, Ravalli, Mineral, Lake, Sanders, Flathead and Lincoln Counties in western Montana. Missoula and Kalispell are the primary urban areas in this region, while most of the remaining service area is characterized by small towns and sparsely populated rural areas. Although Summit's 7-county service area is the smallest CIL region in Montana, Summit's region contains nearly 1/3 of the state's population. Summit is headquartered in Missoula with branch offices in Hamilton, Ronan and Kalispell. Summit also has a second downtown Missoula location housing Summit's youth programs, which are available to all youth throughout Summit's service area. The Lake and Sanders County office is located in Ronan, a community on the Flathead Indian Reservation – the tribal home of the Confederated Salish and Kootenai Tribes. The Hamilton office is responsible for services in Ravalli County, the main office in Missoula primarily serves Missoula and Mineral Counties, and the Kalispell office serves Flathead and Lincoln Counties. Staff members from the Missoula office also travel to outlying counties to serve consumers in the Self Directed Community First Choice/Personal Assistance Services program, as well as to assist with delivery of other independent living services and Summit activities as appropriate.

NCILS conducts activities to increase the number of people served who are members of populations that are currently underserved, which includes any consumer living within the seventeen county service area. NCILS provides IL services within the following seventeen Montana counties of Blaine, Cascade, Choteau, Daniels, Fergus, Glacier, Hill, Judith Basin, Liberty, Petroleum, Phillips, Pondera, Roosevelt, Sheridan, Teton, Toole, and Valley. NCILS' service area includes four American Indian Reservations, which are the Blackfeet Indian Reservation with the counties of Glacier/Pondera, Fort Belknap Indian Reservation within the counties of Blaine/Phillips, Fort Peck Indian Reservation within the counties of Roosevelt/Valley/Daniels, and Rocky Boy's Indian Reservation within the counties of Hill/Choteau. The state recognized Little Shell Band of Chippewa-Cree, headquartered in Great Falls, MT, is also within NCILS' service area.

NCILS maintains one branch office in the town of Glasgow, which primarily serves the most eastern counties of NCILS' service area. Staff members from NCILS also provide outreach to the underserved population of youth with disabilities through the Montana Youth Leadership Forum (MYLF) and the Montana Youth Transitions Project (MYT) office that is located in Lewis and Clark County but provides services for youth state wide.

MILP has three offices: Helena, Butte, and Bozeman, providing services to consumers living in fourteen SW Montana counties. The main office in Helena provides services in Broadwater, Jefferson, and Lewis and Clark Counties; the Butte branch office provides services in Beaverhead, Deer Lodge, Granite, Jefferson, Madison, Silver Bow and Powell Counties; and the Bozeman branch office provides services in Gallatin, Meagher, Park, Sweet Grass, Madison and Wheatland Counties. MILP also provides Orientation & Mobility direct services throughout the state of Montana, with MOUs for O & M with the other three Montana CILs.

MILP has developed relationships with the urban American Indian centers located in Helena and Butte, which demographically have 4,200 citizens who could access those centers. Given the high incidence of disability among American Indians, collaborative outreach between the urban American Indian and independent living centers could improve services to the American Indian population.

3.2 Expansion of Network – 34 CFR 364.25

Describe the design for the further expansion of the network, including identification of the unserved and underserved areas in the State and the order of priority for serving these areas as additional funding becomes available (beyond the required cost-of-living increase).

The plan for further expansion of the network of Centers for Independent Living (CILs) is to build on the existing branch office strategy rather than developing a new CIL. Because all of the state's 56 counties are included within the service area of the four existing centers, each of Montana's four CILs will determine the best course of action to address unmet needs within its service area. Options they will consider could include establishing a new branch office or offices or enhancing/expanding the capacity of existing offices. This SPIL does not designate specific geographic regions of the state as underserved but rather, focuses on underserved populations — youth with disabilities, people with disabilities seeking employment, American Indians with disabilities, and individuals living in rural and frontier areas of the state.

Equalization of funding for Montana CILs is the practice of ensuring that the combined budgets of each center are the same. Equalization of funding for CILs considers the combined monies from Part B, Social Security, Part C, and General Fund sources. Funding from grants such as of the Montana Youth Leadership Forum (MYLF), the Montana Youth Transitions Project (MYTransitions), Work Incentives Planning and Assistance (WIPA), self-directed Personal Assistance Services or any other fee for service dollars are not included in the equalization calculations.

When additional Part C, Part B, Social Security or Montana General Funds become available through cost-of-living adjustments (COLAs), provider rate increases or other appropriations, all four centers will receive increases in the amounts necessary to ensure that their combined overall budgets, consisting of funds from Part B, Social Security, Part C, and the Montana General Fund, remain equal.

For example, if one center receives a relatively larger Part C cost of living adjustment (COLA), that center's General Fund, Social Security, or Part B funding will be adjusted so that the total funding for each center remains equal. When a decrease in funding occurs, the decrease will be applied so that the total funding for each center remains equal. In some cases, a decrease in one funding source may result in an adjustment to a different funding source. However, the total combined funding from Part B, Social Security, Part C, and the Montana General Fund for each center shall always remain equal.

3.3 Section 723 States Only – 34 CFR 364.39

3.3A If the State follows an order of priorities for allocating funds among centers within a State that is different from what is outlined in 34 CFR 366.22, describe the alternate order of priority that the DSU director and the SILC chair have agreed upon. Indicate N/A if not applicable.
N/A

3.3B Describe how the State policies, practices and procedures governing the awarding of grants to centers and the oversight of these centers are consistent with 34 CFR 366.37 and 366.38.
N/A

Section 4: Designated State Unit (DSU)

4.1 Administrative Support Services – 34 CFR 364.4; 34 CFR 364.22(b)

4.1A Describe the administrative support services to be provided by the DSU for the SILS (Part B) program and, if the State is a Section 723 State, for the CIL (Part C) program.

- Refer to the SPIL Instructions for additional information about administrative support services.

Administrative staff support for the SILC is provided by the DSE with Section 110 state general fund matching funds. This program manager position is responsible for assisting with the coordination and hosting of SILC and other related meetings, document development, and serves

as the liaison between the SILC, DSE, and CILs. The program manager also provides support to SILC committees and assists with the development and management of the SPIL. Though the program manager is the primary DSE staff support person, he/she relies on other DSE staff members to provide support based on need and expertise.

The program manager conducts site visits of the CILs and may be accompanied by a SILC representative. The DSE program manager and SILC representative monitor center services and activities as they relate to the SPIL goals and objectives. The program manager also conducts contract compliance reviews to ensure that federal and state regulations and guidelines are adhered to in regard to the Title II, Part B and Section 110 funds and the state match.

The DSE program manager provides logistical support to the SILC in the development of marketing materials and strategies, which promote the SILC and SILC activities. Assistance with the development of SILC orientation materials is also provided. Additionally, the program manager forwards information regarding training opportunities and information that may be pertinent to SILC activities and interests to SILC members.

Logistical support is also provided by the DSE program manager in the search for additional funding for the SILC and CILs. The SILC does not currently receive any funding directly. Rather, the DSE receives grant funds on behalf of the SILC and distributes them through contracts to the CILs. The program manager is responsible for developing these contracts, which after a review and acceptance by the CIL to which it is assigned, is administered by the DSE.

4.1B Describe other DSU arrangements for the administration of the IL program, if any. N/A

Section 5: Statewide Independent Living Council (SILC)

5.1 Resource plan – 34 CFR 364.21(i)

5.1A Describe the resource plan prepared by the SILC in conjunction with the DSU for the provision of resources, including staff and personnel, made available under parts B and C of chapter 1 of title VII, section 101(a)(18) of the Act, and from other public and private sources that may be necessary to carry out the functions of the SILC identified in section 705(c). The description must address the three years of this SPIL.

– Refer to the SPIL Instructions for more information about completing this section.

The sources of funding for the below budget are from (Part B+ match) and (Section 110 + match). The Part B amount varies each year of the SPIL, but the Section 110 + match is expected to stay the same throughout 2017-19. In addition to the above budget, there are in-kind contributions from the DSE. The SILC has no staff but benefits from the efforts of the DSU program manager and other support provided through Part B funds assigned to the DSU for administration expenses of Montana's Part B grant. While the SILC resource plan seems low, a large portion of the "other SPIL activities" budget is the program manager salary and fringe benefits. A significant amount of the program manager's time is dedicated to activities requested by the SILC such as: meeting arrangements, correspondence preparation, liaison with other agencies, boards, councils, and entities, etc.

Sources and Amounts (from the SILC Resource Plan) - Year 1

- Title VII Funds, Chapter 1, Part B
- Non-Federal Funds, State Funds (Title VII Part B State GF match)
- Section 110 (a)(18) of the Act (Innovation and Expansion)

Sources and Amounts (from the SILC Resource Plan)- Year 2

- Title VII Funds, Chapter 1, Part B
- Non-Federal Funds, State Funds (Title VII Part B State GF match)
- Section 110 (a)(18) of the Act (Innovation and Expansion)

Sources and Amounts (from the SILC Resource Plan)- Year 3

- Title VII Funds, Chapter 1, Part B
- Non-Federal Funds, State Funds (Title VII Part B State GF match)
- Section 110 (a)(18) of the Act (Innovation and Expansion)

The following is the budget for each of the three years of the SPIL:

- Meeting Expenses- \$14,021
- Consulting- \$2,250
- Supplies-\$200
- Communications-\$1,000
- Travel-\$4,425
- Other- \$1,500

Total: \$23,396

During the second and third year of the SPIL, the total budget amounts will be the same as the first year.

5.1B Describe how the following SILC resource plan requirements will be addressed:

- The SILC’s responsibility for the proper expenditure of funds and use of resources that it receives under the resource plan.

The funds supporting the SILC resource plan will be handled through a separate account number within the DSE fiscal operation. While approval within the fiscal systems is provided by DSE personnel, the SILC and specifically the SILC chair or chair’s designee are consulted and provide guidance on expenditures. Documentation of the SILC chair’s involvement and authorization is maintained by the program manager. Also, the SILC chair or their designee reconciles recorded expenditures with the approval of expenditures by the DSE on at least a quarterly basis. The SILC chair is responsible for the appropriate use of

the funds and ensuring that expenditures are not made beyond the budget for SILC resources.

- Non-inclusion of conditions or requirements in the SILC resource plan that may compromise the independence of the SILC.

In order to access the support of the DSE fiscal services to support the SILC resource plan, the SILC accepts the state rates for mileage, meals, lodging and council member reimbursement.

- Reliance, to the maximum extent possible, on the use of resources in existence during the period of implementation of the State plan.

All resources for the SILC resource plan come from Part B funds, Section 110 funds, or state matching funds. Since the state legislature only meets every two years, it is only possible to project budget allocations for two years. The state matching funds have been approved for the first year of the plan. The other funds are expected federal allocations.

5.2 Establishment and Placement – 34 CFR 364.21(a)

Describe how the establishment and placement of the SILC ensures its independence with respect to the DSU and all other State agencies.

- Refer to the SPIL Instructions for more information about completing this section.

The SILC was established by Executive Order of the governor. It was further codified under Montana Code Annotated (MCA) 53-7-103. The SILC is not established as an entity within any State agency, including the DSE and is independent of the DSU and all other state agencies. The following is a brief description of the legal status and placement of the SILC:

The SILC is a free-standing body whose members are appointed by the governor. Although it has autonomy and is self-governing, it does not have legal status independent of the DSE and receives some administrative support from the DSE.

The SILC is not required to report to any entity in state government and reports to ACL to meet federal requirements.

The SILC elects the SILC chairperson and other officers. The Executive Committee of the SILC is responsible for implementing the intentions of the SILC, which are expressed through actions taken during the regular meetings of the SILC. The Executive Committee shall have the authority of the SILC in the management of the business of the SILC between meetings of the SILC, subject to the policies established by the SILC.

5.3 Appointment and Composition – 34 CFR 364.21(b) – (f)

Describe the process used by the State to appoint members to the SILC who meet the

composition requirements in section 705(b).

- Refer to the SPIL Instructions for more information about completing this section.

When a vacancy occurs, the Nominations Committee recruits potential members to the SILC.

The Nominations Committee makes recommendations to the SILC to fill upcoming or existing vacancies on the SILC based on a review of SILC applications that focuses on federal requirements for SILC membership.

The SILC approves a list of candidates for appointment to the SILC.

The SILC approved list of candidates is forwarded to the Governor's office with a request to fill upcoming or existing vacancies on the SILC.

At all times, the Governor has open applications for all state councils and boards on the Montana website. Governor's Board and Councils: <http://svc.mt.gov/gov/boards/apply.aspx>. The Governor may receive applications outside of the SILC review process through this source or other activities of his/her choosing. However, his staff members are kept aware of the requirements for serving on the SILC and requirements related to maintaining a majority of members who have a disability who are not employed by a CIL or state agency and other membership requirements.

The Governor selects candidates to fill upcoming or existing vacancies and the Governor's office sends out appointment letters.

The SILC chair is elected by the voting membership of the SILC in even numbered years. The chair must be a voting member of the SILC.

Term limits are maintained by keeping records of when a member is appointed to the SILC and the date of the end of their term and which term they are in (1st or 2nd). This information is distributed to all SILC members and is maintained in their SILC manual.

5.4 Staffing – 34 CFR 364.21(j)

Describe how the following SILC staffing requirements will be met:

- SILC supervision and evaluation, consistent with State law, of its staff and other personnel as may be necessary to carry out its functions.

The SILC does not have staff. The SILC utilizes DSE staff assigned to assist the SILC. The SILC is involved with the evaluation, hiring and supervision of the DSE program manager, who is the primary staff person assigned to assist the SILC. The chairperson of the SILC is consulted in developing the evaluation of the DSE program manager and will note if there are deficiencies in the program manager's performance with regard to responsibilities related to the SPIL and other duties as assigned by the SILC. The current DSE supervisor of the IL program manager is

the Program Support Bureau Chief of the Disability Employment and Transitions Division of the DSE, who sometimes sits in on the SILC meetings and other SILC related activities.

- Non-assignment of duties to SILC staff and other personnel made available by the DSU, or any other State agency or office, that would create a conflict of interest while assisting the SILC in carrying out its duties.

According to the SILC bylaws, no duties are assigned to the DSE personnel made available by the DSE or any other State agency or office that would create a conflict of interest while assisting the SILC in carrying out its duties.

Section 6: Service Provider Requirements

Describe how the following service provider requirements will be met:

6.1 Staffing – 34 CFR 364.23; 34 CFR 364.24; 34 CFR 364.31

- Inclusion of personnel who are specialists in the development and provision of IL services and in the development and support of centers.

The requirements to meet these criteria are included in the contracts for IL services as well as Montana's State Plan for Independent Living. CIL personnel are trained specialists in IL services. During site visits, The IL program manager (DSE) verifies that the IL provider has established and is maintaining a program staff qualified to provide IL services. In addition, during the site visits the IL program manager interviews personnel (IL staff, board of directors, peers and consumers) to assess their knowledge of IL services, and the development and support of centers.

- Availability, to the maximum extent feasible, of personnel able to communicate (1) with individuals with significant disabilities who rely on alternative modes of communication, such as manual communication, nonverbal communication devices, Braille, or audio tapes and (2) in the native languages of individuals with significant disabilities whose English proficiency is limited and who apply for or receive IL services under title VII of the Act.

The requirements to meet these criteria are included in the contracts for IL services as well as Montana's State Plan for Independent Living. Alternative methods of communication are provided by the CILs to consumers who request them. During site visits the IL program manager (DSE) determines if the IL provider has established a program that is accessible to individuals with significant disabilities who rely on different modes of communication. The IL program manager requests a copy of materials in braille, audio tapes and electronic formatted materials. The CIL executive director is asked to describe other equipment that is used by staff to communicate with people who have significant disabilities. Also, CILs describe any processes that are used to communicate in native languages of individuals with significant disabilities. During a site visit, the IL program manager (DSU) assesses that availability of personnel to communicate and the compliance by the service providers, which is monitored by reviewing the annual reports of the contractors (CILs).

- Establishment and maintenance of a program of staff development for all classes of positions involved in providing IL services and, where appropriate, in administering the CIL program, improving the skills of staff directly responsible for the provision of IL services, including knowledge of and practice in the IL philosophy.

The requirements to meet these criteria are included in contracts for IL services. IL specialists are trained and qualified to provide IL services. Opportunities are provided for the IL specialists to improve their knowledge and skills. During site visits the IL program manager reviews CIL policies and procedures, training plans, staff handbooks, etc. to determine whether such training is being offered and implemented. The IL program manager also conducts interviews with staff and board of directors to assess whether their training and development requirements for their positions are being met.

- Affirmative action to employ and advance in employment qualified individuals with significant disabilities on the same terms and conditions required with respect to the employment of individuals with disabilities under section 503 of the Act.

The requirements to meet these criteria are included in contracts for IL services. Affirmative action policies are included in the CIL policies and procedures, staff handbooks and other documents. During site visits the IL Program Manager reviews all policies and procedures, job descriptions, and related documents to ensure that the affirmative action requirements are being met. The IL program manager also conducts interviews with center staff and board members to assess the use of affirmative action to employ and advance qualified individuals.

– 6.2 Fiscal Control and Fund Accounting – 34 CFR 364.34

- Adoption of those fiscal control and fund accounting procedures as may be necessary to ensure the proper disbursement of and accounting for funds made available through parts B and C of chapter 1 of title VII of the Act, in addition to complying with applicable EDGAR fiscal and accounting requirements.

Under the provisions of their contracts, service providers are required to have accounting procedures that conform to Generally Accepted Accounting Principles (GAAP) and which follow Uniform Guidance (CFR 200) regulations.

Compliance by service providers is monitored by reviewing annual reports of the contractors and through periodic audits by state auditors.

6.3 Recordkeeping, Access and Reporting – 34 CFR 364.35; 34 CFR 364.36; 34 CFR 364.37

- Maintenance of records that fully disclose and document the information listed in 34 CFR 364.35.
- Submission of annual performance and financial reports, and any other reports that the Secretary determines to be appropriate

- Access to the Commissioner and the Comptroller General, or any of their duly authorized representatives, for the purpose of conducting audits, examinations, and compliance reviews, to the information listed in 34 CFR 364.37.

The above criteria are included in the contracts for IL services. These federally funded CILs are required to meet standards for recordkeeping, access, and reporting established by state and federal regulations. The criteria are also included in the service provider policies and procedures.

Compliance with the established criteria is monitored by review of contractor (CIL) annual reports, DSE site visits and through periodic audits by state auditors.

6.4 Eligibility – 34 CFR 364.40; 34 CFR 364.41

- Eligibility of any individual with a significant disability, as defined in 34 CFR 364.4(b), for IL services under the SILS and CIL programs.
- Ability of any individual to seek information about IL services under these programs and to request referral to other services and programs for individuals with significant disabilities.
- Determination of an individual's eligibility for IL services under the SILS and CIL programs in a manner that meets the requirements of 34 CFR 364.51.
- Application of eligibility requirements without regard to age, color, creed, gender, national origin, race, religion, or type of significant disability of the individual applying for IL services.
- Non-exclusion from receiving IL services of any individual who is present in the State and who is otherwise eligible for IL services, based on the imposition of any State or local residence requirement.

These criteria are included in contracts for IL services. Service provider policies and procedures also include these criteria. Compliance is monitored by reviewing service provider annual reports, quarterly reports required by contract, and during site visits where specific questions regarding eligibility requirements are asked of center staff and board of directors.

6.5 Independent Living Plans – 34 CFR 364.43(c)

- Provision of IL services in accordance with an IL plan complying with Sec. 364.52 and mutually agreed upon by the individuals with significant disabilities and the appropriate service provider staff unless the individual signs a waiver stating that an IL plan is unnecessary.

These criteria are included in contracts for IL services. Consumers are informed of their rights to develop an Independent Living Plan (ILP) or to waive development of the plan during a meeting with service provider staff. Copies of the waiver are maintained with the CSR.

Compliance is monitored by reviewing service provider annual reports and during site

visits by the IL program manager.

6.6 Client Assistance Program (CAP) Information – 34 CFR 364.30

- Use of accessible formats to notify individuals seeking or receiving IL services under chapter 1 of title VII about the availability of the CAP program, the purposes of the services provided under the CAP, and how to contact the CAP.

The consumers are informed in accessible formats of their rights under the Client Assistance Program and how to contact CAP during their meeting with the CIL provider staff person. During the IL provider site visit, the IL program manager (DSE) reviews some of the CSRs for accessible formats. In addition, the DSE disseminates a survey to assess the IL Customer's satisfaction and statewide IL needs which contains the question, "When you requested services, were you notified of your consumer rights and appeals process, including the Client Assistance Program (CAP)."

6.7 Protection, Use and Release of Personal Information – 34 CFR 364.56(a)

- Adoption and implementation of policies and procedures meeting the requirements of 34 CFR 364.56(a), to safeguard the confidentiality of all personal information, including photographs and lists of names.

HIPAA and HITECH Privacy and Security requirements are included in the contracts for IL services. A copy of the requirements is provided to consumers in an accessible format. Compliance is monitored through a review of the service provider annual reports. During IL program manager site visits some of the CSRs are reviewed for inclusion of HIPPA and other release of information forms signed by consumers.

Section 7: Evaluation

Describe the method that will be used to periodically evaluate the effectiveness of the plan in meeting the objectives established in Section 1. The description must include the State's evaluation of satisfaction by individuals with significant disabilities who have participated in the program. 34 CFR 364.38

Goals and the related objective(s) From Section 1	Method that will be used to evaluate
Goal 1: IL systems operate effectively and efficiently.	
Objective 1: Explore the pros and cons of the SILC becoming a 501C-3 by the end of year 3 through a SILC committee comprised of SILC members, CILs, and other stakeholders to be formed no later than March 1, 2017.	The committee will meet as needed and provide reports regularly to the SILC A final recommendation will be made to the SILC by the end of year 3.
Objective 2: In partnership with the MT	• Training on resource development is taken

network of CILS the SILC will explore and seek funding opportunities to meet increasing demand, federal requirements, and enhance IL Services.	<ul style="list-style-type: none"> • Funding opportunities are sought. • Progress on resource development is reported to the SILC.
Objective 3: In partnership with the MT network of CILS, the SILC will explore training opportunities that align with IL Philosophy.	<ul style="list-style-type: none"> • Training is included on the SILC meeting agenda • The IL Program Manager provides information on additional training opportunities as they become available • During SILC meetings SILC members and CILs report on training they have attended. • The IL network will meet annually to report best and emerging practices.
Goal 2: Affect public and private policy and practice through advocacy, education, training, and awareness	
Objective 1: Promote education and awareness to the public to mitigate attitudinal barriers towards people with disabilities.	<ul style="list-style-type: none"> • Hold structures public listening sessions annually to identify progress made and future needs for education and awareness. • Education and Public Relations Committee will report at SILC meetings on the social media and targeted information disseminated. • CILs will report at SILC meetings on education activities conducted or participated in.
Objective 2: People with disabilities are provided opportunities to be involved in promoting disability rights at the local, state, and national levels.	<ul style="list-style-type: none"> • An action alert system is set up. • A list of active partners and stakeholders engaged by the SILC and CILs is developed and maintained. • The Legislative Advocacy Committee reports at SILC meetings • Activities and outcomes are listed in the annual 704 Report.
Objective 3: SILC will partner with and support Montana CIL Network efforts to promote systemic change.	<ul style="list-style-type: none"> • SILC members report at meetings the ways they have engaged with CIL opportunities. • Consumer listening sessions are summarized and reported on at SILC meetings annually.
Objective 4: The Montana CIL Network will work to ensure that people with disabilities and communities are ready and able for transitions/diversion from institutions to live in the community of their	<ul style="list-style-type: none"> • A collaborative workgroup conducts advocacy and other activities to ensure that transition services are at least maintained after the MFP grant expires in 2018.

choice.	<ul style="list-style-type: none"> • A MFP position paper is completed by January 2019.
Goal 3: People with disabilities will have access to and receive quality and appropriate services.	
Objective 1: The Montana CIL Network will target unserved and underserved Populations through the current outreach model.	<ul style="list-style-type: none"> • Activities and outcomes are entered into the annual 704 report • CIL directors report on outreach activities at SILC meetings • Semi-annually report during SILC meetings on recruitment and outreach efforts of consumers for SILC inclusion.
Objective 2: The Montana CIL Network will serve people with disabilities through the 5 core and other IL services	<ul style="list-style-type: none"> • A least 1 training event is provided to enhance CIL services. • CIL and SILC members report at SILC meetings on outreach and collaboration efforts.
Objective 3: Maintain and expand current practices to serve youth that are not identified in the 5 th core service.	<ul style="list-style-type: none"> • Youth receive services through Montana Youth Leadership Forum (MYLF) and Montana Youth Transitions as well as through programs sponsored by the CILS. • Collaboration and coordination takes place between schools, CILS, SILC, VR, and other youth programs. • Activities and outcomes are entered into the annual 704 report.

Section 8: State-Imposed Requirements

Identify any State-imposed requirements contained in the provisions of this SPIL. Indicate N/A if not applicable. 34 CFR 364.20(h)

In order to utilize the state accounting systems for fiscal transactions the SILC agrees to follow state rates for lodging, mileage, and meals. Grant funds coming into the state must be appropriated through the legislature under the following guidelines: " MT Constitution, Article 5, Section 11, Subsections 4 and 5. (4) A general appropriation bill shall contain only appropriations for the ordinary expenses of the legislative, executive, and judicial branches, for interest on the public debt, and for public schools. Every other appropriation shall be made by separate bill, containing but one subject. (5) No appropriation shall be made for religious, charitable, industrial, educational, or benevolent purposes to any private individual, private association, or private corporation not under control of the state. Also, monitoring of compliance related to fiscal issues is necessary to ensure compliance of contracts related to the SPIL. The state charges indirect costs to the Part B grant and any other funds awarded to the DSU to support the IL program."